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J and J Purchasing LLC, The Judd Irrevocable Trust,
and BJ Holdings LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE COMMISSION.

Case No. 2:22-CV-00612-CDS-EJY

Plaintiff,
vs.

**STIPULATION AND ORDER
AUTHORIZING THE SALE OF
REAL PROPERTY HELD IN THE
NAME OF SHANE JAGER WITH
PROCEEDS FROM SALE TO BE
TRANSFERRED FROM ESCROW
DIRECTLY TO THE RECEIVER**

MATTHEW WADE BEASLEY 11

Defendants

THE JUDD IRREVOCABLE TRUST *et al*

Relief Defendants.

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**STIPULATION AND ORDER AUTHORIZING THE SALE OF REAL PROPERTY
HELD IN THE NAME OF SHANE JAGER WITH PROCEEDS FROM SALE TO
BE TRANSFERRED FROM ESCROW DIRECTLY TO THE RECEIVER**

3 The following Stipulation and [Proposed] Order regarding the sale of real property held in
4 the name of Shane Jager and Willow Jager, Trustees of the Jager Family Trust dated June 30, 2009
5 with proceeds from the sale to be transferred from escrow directly to the Receiver is made by and
6 between Geoff Winkler, the Court-appointed receiver in the above-entitled action (the "Receiver"),
7 the Plaintiff Securities and Exchange Commission (the "Commission") on the one hand, and
8 Defendant Shane Jager and nonparty Willow Jager individually and as trustees of the Jager Family
9 Trust dated June 30, 2009 ("Jager Parties") on the other hand, by and through their respective
10 representatives, and with respect to the following facts:

11 1. The Receiver was appointed on June 3, 2022 pursuant to this Court's Order
12 Appointing Receiver [ECF No. 88] which was amended on July 28, 2022 [ECF 207] (collectively
13 the "Appointment Order").

14 2. Among other things, the Appointment Order required the turnover of certain funds
15 and assets to the Receiver, including real property owned by Mr. Jager which includes a home
16 located at 305 Calle Francesca, San Clemente, CA (“Calle Francesca Property”) which is owned
17 by the Jager Parties.

18 3. The Calle Francesca Property was purchased by the Jager Parties on February 8,
19 2022, for \$7,499,999 and the Jager Parties have received a cash offer to sale the same for
20 \$8,200,000. The Buyer has agreed to pay an initial deposit of 2.9% or \$235,000 and intends to
21 close escrow in 20 days (the “Offer”). It is understood the Offer represents fair market value for
22 the Calle Francesca Property.

23 4. There is currently a loan secured by the property in the approximate outstanding
24 amount of \$3,936,248.56 and it is estimated that after payment of the same, and fees associated
25 with the sale, the net proceeds of the sale of the Calle Francesca Property will between \$3,900,000
26 to \$4,000,000.

27 5. The net proceeds from the sale of the Calle Francesca Property will be wired
28 directly to the Receiver from escrow.

1 6. Given nature of the Offer, including the sale price, the cash nature of the same and
 2 the ability for the sale to close quickly, the Receiver and the Commission are agreeable to the sale
 3 moving forward on an expedited basis with all proceeds from the sale being provided directly to
 4 the Receiver.

5 7. The parties agree that the Offer is market appropriate and have concerns that failing
 6 to immediately move forward will endanger the consummation of the sale which will have
 7 significant benefits to the estate, and therefore believe this stipulation is necessary, is in the best
 8 interest of all parties and the receivership estate and therefore waive any requirements imposed by
 9 28 U.S.C. § 2001, et. seq. to the extent they are applicable to the Offer and proposed sale.

10 **ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED** by and between the
 11 undersigned counsel that:

- 12 A. The Jager Parties may accept the Offer;
- 13 B. That any deposit received relating to the Offer be provided directly to the Receiver;
 14 and
- 15 C. Upon the consummation of the sale of the Calle Francesca Property, including the
 16 payment of the current mortgage, that the net proceeds of the sale shall be wired directly
 17 from escrow to the Receiver.

18 DATED this 8th day of August, 2022.

19 GREENBERG TRAURIG, LLP

20 */s/ Kara B. Hendricks*

21 By:

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18 DATED this 8th day of August, 2022.

19 SECURITIES & EXCHANGE
 20 COMMISSION

21 */s/ Casey R. Fronk*

22 By:

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12 *Attorneys for Receiver Geoff Winkler*

13 8 DATED this 8th day of August, 2022.

14 9 PALAZZO LAW FIRM

15 10 /s/ *T. Louis Palazzo*

16 11 By: _____
17 T. Louis Palazzo, Bar No. 4128
18 520 S. Fourth Street
19 Las Vegas, NV 89101
20 *Counsel for Defendant Shane Jager, Non*
21 *Party Willow Jager individually and as*
22 *Trustees of the Jager Family Trust dated*
23 *June 30, 2009*

24 15 IT IS HEREBY ORDERED that:

25 16 A. The Jager Parties may accept the Offer;

26 17 B. That any deposit received relating to the Offer be provided directly to the Receiver;
27 18 and
28 19 C. Upon the consummation of the sale of the Pearl Street Property including the payment
20 20 of the current mortgage, that the net proceeds be wired directly from escrow to the
21 21 Receiver.

22 22 Dated: August 9, 2022

23 23 Hon. Cristina D. Silva
24 24 Judge, United States District Court